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September 16, 2020

Magistrate Judge Hildy Bowbeer
United States District Court
632 Federal Building
316 North Robert Street
St. Paul, MN 55101

*Via email bowbeer_chambers
@mnd.uscourts.gov and ECF Filing*

Re: Michelle Jacobson v. County of Chisago and Richard Duncan
Court File No.: 18-CV-02528-SRN-HB

Dear Magistrate Judge Bowbeer:

This is an update on the pending criminal case in Anoka County District Court.

After some delay, partially due to COVID, an Omnibus hearing is scheduled for the afternoon of Thursday, October 22nd. There are three counts against Mr. Duncan: stalking, threats of violence, and misconduct by a public official.

Motions are pending to dismiss all of the charges on various grounds, including lack of a grand jury indictment, absence of probable cause, and unconstitutionality of the stalking statute, per recent Minnesota case law.

The court will have up to 90 days to rule and, if any charges remain and are not otherwise resolved, the case would probably be scheduled for trial sometime in early or mid-2021.

We look forward to this Friday morning's telephone conference.

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Respectfully submitted,

MEYER NJUS TANICK, PA

/s/: Marshall H. Tanick

Marshall Tanick

MHT/dt

Cc: Dyan Ebert
Leslie Lienemann